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January 13, 2025

VIA PACER CM/ECF

Hon. Jeannette A. Vargas, U.S.D.J.
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

**RE: Denise Crumwell v. Engelbert Strauss, Inc.,
Case No. 1:24-cv-08409-JAV**

Dear Judge Vargas:

This firm represents Defendant Engelbert Strauss, Inc. ("Defendant") in the above-referenced matter. Plaintiff Denise Crumwell ("Plaintiff") filed her Complaint on November 4, 2024, and Defendant was served on December 11, 2024. Defendant's Answer to the Complaint was due January 2, 2025. Defendant, whose company is based outside of the United States, just returned to their offices this week. As such, Defendant just retained undersigned counsel on January 10, 2025. We have conferred with Plaintiff's counsel regarding a brief extension of time. Pursuant to Your Honor's Individual Rules and Practices for Civil Cases 3(E), Defendant respectfully requests an extension of forty-five (45) days to respond to the Complaint, to address the allegations, and to discuss possible resolution. Although we recognize that Rule 3(E) of Your Honor's Individual Rules and Practices for Civil Cases provides that requests for extensions will ordinarily be denied if made after the expiration of the original deadline, given the unusual circumstances here and the Plaintiff's consent, this request is being made in good faith. The new response date would be February 27, 2025. This is the first request for an extension of time. The request is brought in good faith and is not intended to delay the case. Neither the parties nor the Court will be prejudiced if the brief extension requested is granted. Plaintiff's counsel consents to this request.

Thank you for your consideration.

Respectfully submitted,

/s/ Vincent N. Avallone
Vincent N. Avallone, Esq.

cc: All Counsel of Record (via ECF)